

**Radiological National Emission Standards  
for Hazardous Air Pollutants (NESHAP)  
2015 Annual Report for the  
Department of Energy  
Portsmouth Gaseous Diffusion Plant,  
Piketon, Ohio**

**U.S. Department of Energy  
DOE/PPPO/03-0761&D0**

**June 2016**



This document is approved for public release  
per review by:

Sam Eldridge  
PORTS Classification/Information Office

5/26/16  
Date

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**June 2016**

**By  
FBP LLC, a Joint Venture Under Contract DE-AC30-10CC40017**

**FBP-ER-RCRA-WD-RPT-0235, Revision 0**

The following certifications pertain to the U.S. Department of Energy (DOE) activities at the Portsmouth site. It is DOE's understanding that the Centrus Energy Corporation (CENTRUS) will be submitting a separate Radiological National Emission Standards for Hazardous Air Pollutants (NESHAP) 2015 Annual Report and certification pertaining to its activities at the Portsmouth site.

### DOE Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted herein and based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment. See, 18 U.S.C. 1001.

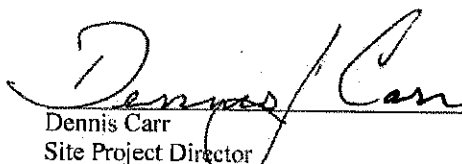


Dr. Vincent Adams  
Portsmouth Site Director  
Portsmouth/Paducah Project Office  
U.S. Department of Energy

6/21/16  
Date

### Fluor-BWXT Portsmouth LLC Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted herein and based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment. See, 18 U.S.C. 1001.



Dennis Carr

Site Project Director

Fluor-BWXT Portsmouth LLC (Operator)

(For information pertaining to Fluor-BWXT Portsmouth LLC sources)

Date

6-20-16

## **BWXT Conversion Services, LLC Certification**

I certify under penalty of law that I have personally examined and am familiar with the information submitted herein and based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment. See, 18 U.S.C. 1001.

  
\_\_\_\_\_  
John D. Woolery

President and Project Manager

BWXT Conversion Services, LLC (Operator)

(For information pertaining to the DUF<sub>6</sub> conversion facility)

6/20/16  
Date

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## ACRONYMS

ACP	American Centrifuge Operating LLC
BWCS	BWXT Conversion Services, LLC
CAP88-PC	Clean Air Assessment Package
Centrus	Centrus Energy Corporation
CFR	Code of Federal Regulations
Ci	curie
DOE	U.S. Department of Energy
DUF <sub>6</sub>	depleted uranium hexafluoride
FBP	Fluor-BWXT Portsmouth LLC
GWTF	Ground Water Treatment Facility
HEPA	high efficiency particulate
HVAC	heating, ventilation, and air conditioning
MEI	maximally exposed individual
mrem	millirem
NESHAP	National Emission Standards for Hazardous Air Pollutants
NPDES	National Pollutant Discharge Elimination System
pCi	picocurie
PORTS	Portsmouth Gaseous Diffusion Plant
U <sub>3</sub> O <sub>8</sub>	triuranium octaoxide
USEC	United States Enrichment Corporation
U.S. EPA	U.S. Environmental Protection Agency



## EXECUTIVE SUMMARY

This report provides the information required by Title 40 of the *Code of Federal Regulations (CFR)* Part 61, National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart H, National Emission Standards for Emissions of Radionuclides Other Than Radon from Department of Energy (DOE) Facilities.

DOE owns the Portsmouth Gaseous Diffusion Plant (PORTS) site, which has radionuclide air emissions from DOE operations. DOE leases a portion of the site to Centrus Energy Corporation (Centrus) (formerly United States Enrichment Corporation). DOE and Centrus operations were included in the estimate of dose to the public for radionuclide emissions from the PORTS site; however, DOE certifies the information relating to its operations only.

BWXT Conversion Services, LLC (BWCS) operated the DUF<sub>6</sub> conversion facility as a DOE contractor in 2015. The conversion facility processes DUF<sub>6</sub> cylinders via a fluidized bed system to produce uranium oxide and salable hydrofluoric acid. This facility has one emission source, the conversion building stack.

Radionuclide emissions from the DOE sources are modeled by the Clean Air Assessment Package (CAP88-PC) Version 4.0 computer program [approved by the United States Environmental Protection Agency (U.S. EPA)] to estimate the effective dose to members of the public. Emissions from the DUF<sub>6</sub> conversion facility, X-326 Top Purge Cascade, X-326 and X-330 Seal Exhaust Stations, X-330 Cold Recovery System, X-330 Building Wet Air Evacuation System, X-344A Cold Trap Area and Gulper, X-700 Cleaning Building, X-705 Decontamination Facility, Calciners, Glove Boxes, and Storage Tank Vents, X-710 Laboratory Fume Hoods, X-720 Maintenance Facility, X-735 Landfill, XT-847 Glove Box, X-326 L-cage Glove Box and the X-622, X-623, X-624, and X-627 Groundwater Treatment Facilities were used to estimate the effective dose for 2015.

The effective dose to individuals based on Centrus emissions has been combined with the DOE PORTS effective dose. In 2015, the maximum effective dose for Centrus was 0.0000067 millirem (mrem)/year, as provided to DOE by Centrus. DOE is certifying the effective dose for DOE activities only. DOE is not certifying the accuracy of the Centrus data, calculations, or results. DOE understands that the Centrus PORTS NESHAP report will be provided to U.S. EPA by Centrus and will be certified by Centrus.

The effective dose from DOE sources at PORTS is combined with the Centrus effective dose to determine a total effective dose from the PORTS facility. The highest combined effective dose is the maximum effective dose to the maximally exposed individual (MEI) who is a member of the public. In 2015, the maximum combined effective dose to the MEI was 0.037 mrem/year (0.037 mrem/year from DOE sources and 0.0000028 mrem/year from the Centrus source), which is well below the NESHAP standard of 10 mrem/year.

DOE collects samples from 15 ambient air monitoring stations located on and near the PORTS reservation and analyzes them for the radionuclides that could be present in ambient air due to PORTS activities. These radionuclides are isotopic uranium (uranium-233/234, uranium-235/236, and uranium-238), technetium-99, and selected transuranic isotopes (americium-241, neptunium-237, plutonium-238, and plutonium-239/240). The ambient air monitoring stations measure radionuclides released from the DOE and Centrus point sources, fugitive air emissions, and background concentrations of radionuclides.

The CAP88-PC model was used to generate a dose conversion factor that was used to calculate a dose (in mrem/year) for a given activity of each radionuclide in air (in picocuries per cubic meter). A dose was computed for each ambient air monitoring station. The net dose for each ambient air monitoring station (subtracting the dose measured at the background station) ranged from 0 (at stations with a gross dose less than the background station) to 0.0012 mrem/year. These results indicate that fugitive emissions of radionuclides from the PORTS reservation do not cause a significant dose to individuals near the site and further demonstrate that emissions of radionuclides from PORTS are well within NESHAP limits.

## 1. FACILITY INFORMATION

### 1.1 SITE DESCRIPTION

The Portsmouth Gaseous Diffusion Plant (PORTS) in Piketon, Ohio, began uranium enrichment operations using the gaseous diffusion process in 1954. Uranium enrichment operations at PORTS continued until May 2001.

Department of Energy (DOE) owns the PORTS site, which has radionuclide air emissions from DOE operations. DOE leases a portion of the site to Centrus, whose operations also have radionuclide air emissions. DOE and Centrus operations were included in the estimate of dose to the public for radionuclide emissions from the PORTS site; however, DOE certifies the information relating to its operations only.

Centrus demonstrated centrifuge enrichment technology at PORTS in a commercial-scale uranium enrichment cascade in the Lead Cascade Facility. After the conclusion of that demonstration project, Centrus is now demobilizing the Lead Cascade while continuing to improve the technology and pursuing opportunities for a commercial scale uranium enrichment capability in the future.

This report covers only the DOE operations at PORTS. The Depleted Uranium Hexafluoride (DUF<sub>6</sub>) conversion facility was built for DOE at PORTS to process DUF<sub>6</sub> produced by the gaseous diffusion process. DUF<sub>6</sub>, which is stored in cylinders, is converted to a more stable uranium oxide, which will be made available for beneficial reuse, storage, and/or disposal.

### 1.2 SOURCE DESCRIPTION

DOE is responsible for the following stack sources regulated by the U.S. Environmental Protection Agency (U.S. EPA) under the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart H: the DUF<sub>6</sub> conversion facility, X-326 Top Purge Cascade, X-326 and X-330 Seal Exhaust Stations, X-330 Cold Recovery System, X-330 Building Wet Air Evacuation System, X-344A Cold Trap Area and Manifold Evacuation/Gulper, X-705 Decontamination Facility, Calciners, Glove Boxes, and Storage Tank Vents, X-700 Cleaning Building, X-710 Laboratory Fume Hoods, X-720 Maintenance Facility, X-735 Landfill, XT-847 Glove Box, X-326 L-cage Glove Box, X-622 Groundwater Treatment Facility, X-623 Groundwater Treatment Facility, X-624 Groundwater Treatment Facility, and X-627 Groundwater Treatment Facility.

#### 1.2.1 MAJOR SOURCES

Sixteen sources associated with the former gaseous diffusion plant and related operations are equipped with continuous emissions samplers. In accordance with 40 CFR 61.93(b)(4)(i), these Major Sources were identified as having potential emissions of radionuclides which could cause an effective dose equivalent greater than 1% of the standard (10 mrem/yr). Eight samplers operated during 2015. The other eight sources were inactive during 2015, and therefore were not sampled. All eight Major Sources are sampled continuously when operating by flow-proportional, isokinetic samplers to provide emissions data. These Major Sources are listed in Table 1 and described in the following paragraphs.

**Table 1. PORTS Major Sources**

Location	Vent Identification Number
X-326 Top Purge Vent	X-326-P-2799
X-326 Side Purge Vent (inactive)	X-326-P-2798
X-326 Emergency Jet Vent	X-326-P-616
X-326 Seal Exhaust Vent 6	X-326-A-540
X-326 Seal Exhaust Vent 5	X-326-A-528
X-326 Seal Exhaust Vent 4	X-326-A-512
X-330 Seal Exhaust Vent 3 (inactive)	X-330-A-279
X-330 Seal Exhaust Vent 2 (inactive)	X-330-A-262
X-333 Seal Exhaust Vent 1 (inactive)	X-333-A-851
X-330 Cold Recovery/Building Wet Air Evacuation Vent (inactive)	X-330-A-272
X-333 Cold Recovery Vent (inactive)	X-333-P-852
X-333 Building Wet Air Evacuation Vent (inactive)	X-333-P-856
X-343 Cold Trap Vent (inactive)	X-343-P-468
X-344A Gulper Vent	X-344-P-929
X-344A Cold Trap Vent	X-344-P-469
DUF <sub>6</sub> Conversion Building Stack	X-1700-001

#### X-326 Top and Side Purge Cascades

The two purge cascades continuously separate light gases from process gas (UF<sub>6</sub>) using gaseous diffusion. For operational control, each of the two purge cascades is monitored separately with real-time instruments called "space recorders".

The Top Purge Cascade operated to support the in-situ deposit removal activities until it was shut down on May 30, 2012. The Side Purge Cascade is in standby. In the X-326 building dry and ambient air is run through the cells of equipment being removed prior to sampling under the *Phase 1 Sampling and Analysis Plan for the Process Equipment Characterization in Support of Site-wide Waste Disposition Evaluation Project at the Portsmouth Gaseous Diffusion Plant Piketon Ohio (DOE/PPPO/03-0120&D2)*. This air is vented through the existing continuously monitored vents.

#### Seal Exhaust Stations

The seal exhaust (SE) stations maintain a vacuum within cascade compressor shaft seals to prevent incursion of wet air to the cascade. Two of the seal exhaust stations (Areas 1 and 2) have been shut down. The rest of the seal exhaust stations continue to operate to support the sampling project. All of the seal exhaust stations are available for use if needed.

### Cold Recovery Systems

The cold recovery systems are intermittently operated maintenance support systems used to prepare cascade equipment (e.g., cells) for internal maintenance. There are two cold recovery systems operated at PORTS with one each in the X-330 and X-333 Process Buildings. In X-330, the cold recovery system shares a common vent and vent sampler with the building wet air evacuation system.

Only the X-330 Cold Recovery System continues to operate as needed to support projects. However, the X-330 Cold Recovery System has not been in use since May, 2010. Both of the Cold Recovery Systems are available for use if needed.

### Building Wet Air Evacuation Systems

The building wet air evacuation systems are intermittently operated maintenance support systems. There are two building wet air evacuation systems, one associated with each of the cold recovery systems described above for the X-330 and X-333 buildings. In X-330, the cold recovery and building wet air evacuation systems share a common vent and sampler.

Only the X-330 Building Wet Air Evacuation System continues to operate to support projects. However, the X-330 Building Wet Air Evacuation System has not been in use since January, 2012. This system shares a common vent with the X-330 Cold Recovery System. Both of the Building Wet Air Evacuation Systems are available for use if needed.

### X-343 and X-344A Cold Trap Areas

Under PORTS' historic configuration, autoclaves in the X-343 facility vaporized UF<sub>6</sub> in 14-ton cylinders. Autoclaves in the X-344A facility liquefied enriched UF<sub>6</sub> in 14-ton or 10-ton cylinders for quality control sampling and transfer to 2.5-ton cylinders for shipment to customers.

To deal with the residual gases without an operating enrichment cascade, cold trap systems similar to those in the cascade cold recovery areas were refurbished and upgraded in both facilities. (The cold trap systems were part of the original design of both facilities, but were taken out of service after the piping evacuation systems were redirected back to the cascade.) As part of the upgrades, both systems received new continuous vent samplers based on the continuous vent samplers used on other vents at PORTS. The new samplers are equipped with radiation monitors to track the accumulation of radioactive material in the sampler traps in real-time.

In 2015, the X-343 was in a cold shutdown condition. There are no current plans to restart any of the autoclave operations in the building. The X-344A facility was in operation during 2015.

### X-344A Gulper Vent

The X-344A UF<sub>6</sub> Sampling Building contains a sampling and transfer system for sampling the product and for filling customer cylinders with low assay UF<sub>6</sub>. The term "assay" refers to the concentration of <sup>235</sup>U in weight percent. In the event of a trace release occurring in spite of the purge and evacuation procedure, a "gulper" is mounted behind the manifold-to-cylinder connections. The gulper is simply a continuous vacuum nozzle, similar in principal to a lab hood, which draws any small releases from the room air into a filtration system. The filtration system has two filter banks, each consisting of a roughing filter followed by high efficiency particulate air (HEPA) filters and a centrifugal blower.



### DUF<sub>6</sub> Conversion Facility

The DUF<sub>6</sub> conversion facility produces uranium oxide dust that is primarily in the form of triuranium octaoxide (U<sub>3</sub>O<sub>8</sub>). Multiple prefilters and primary HEPA filter banks within the facility heating, ventilation, and air conditioning (HVAC) system control particulate emissions of oxide powder. Prior to atmospheric venting of process off gas through the stack, air passes through a secondary set of HEPA filter banks. The conversion building is also maintained at negative pressure to help eliminate the possibility of fugitive emissions.

#### **1.2.2 MINOR SOURCES**

PORTS has a number of unmonitored and potential emission sources associated with process support activities and groundwater treatment. These Minor Sources are point sources that have the potential to emit radionuclides that produce a dose less than or equal to 0.1 mrem. Emissions from these sources are evaluated in accordance with 40 CFR 61.93(b)(4)(i), which states: *For other release points which have a potential to release radionuclides into the air, periodic confirmatory measurements shall be made to verify the low emissions.*

The potential sources are primarily room ventilation exhausts and/or pressure relief vents from areas that have a potential for an internal radionuclide release.

Emission estimates for the X-705 Decontamination Facility, X-705 Calciners, X-705 Glove Boxes, and X-705 Storage Tank Vents were conservatively updated based on 2014 operational levels due to the intermittent operation of the X-705 in 2015. The X-710 Laboratory Fume Hoods operations were consistent with previous reporting years and therefore, the estimated emissions from this source were not changed. The XT-847 Glove Box did not operate in 2015. The estimates for these sources are based on the methodology in Appendix D of 40 CFR 61 and will be evaluated and updated in 2020. Emissions for the other Minor Sources are determined as described in Section 2.1.2. Emissions estimates were calculated using the historic data for materials handled/processed through the emissions unit; the control efficiencies for air pollution control device for the emissions unit; and the physical state of the material handled. Two emission units did not operate during the calendar year as detailed below.

### X-705 Decontamination Facility

Equipment that is removed from the PORTS cascade is covered with tarp bags at the point of removal and transported to the X-705 Decontamination Facility. Small parts may be cleaned in hand tables, while large parts may be sent through an automated tunnel. The hand tables consist of shallow acid baths where metal parts can be decontaminated by passive soaking. The hand tables have fume hoods over them to protect workers from acid fumes. Pressure relief vents are standard on such equipment. The tunnel is an enclosed series of "booths" that can decontaminate large parts by spraying with decontamination solutions as a small dolly carries the parts through the tunnel. The tunnel is ventilated to prevent a buildup of acid fumes. In all cases, radionuclides (uranium and technetium) are dissolved in the liquid phase and collected for recovery of the uranium. None of the radionuclides are volatilized through normal operation of these facilities and only trace radionuclides carried by entrained droplets would be expected.

### X-705 Calciners

Solutions are processed in the Uranium Recovery Area to yield a concentrated uranyl nitrate solution, which is converted into uranium oxide powder in one of two calciners located in X-705. A calciner consists of an inclined heated tube with the uranyl nitrate solution entering at the top and air entering at the bottom. The uranium is first dried and then oxidized as it passes down the tube. The uranium oxide powder is collected directly into a five-inch diameter storage can at the lower end of the calciner tube. The gaseous stream leaves the upper end of the calciner and is exhausted through a scrubber for NO<sub>x</sub> control. Uranium is recovered from the spent scrubber solution through a microfiltration process and the effluent is

discharged to a National Pollutant Discharge Elimination System permitted outfall. Turbulence and flow rates through the calciners are controlled to minimize blowback of the uranium oxide. Any blowback that does occur is entrapped by the entering uranium solution.

#### X-705 Glove Boxes

The five-inch can that collects the uranium oxide powder from each calciner is housed in a glove box to prevent the loss of the material. In addition, there is a separate glove box which is used for sampling the material in the can. The glove boxes have air locks for the entry and removal of work materials and are maintained under negative pressure during use. This negative pressure is produced by an exhaust fan drawing through a HEPA filter.

#### X-705 Storage Tank Vents

Uranium-bearing solutions awaiting treatment are stored in five-inch diameter tanks inside the X-705 facility. All of these tanks are manifolded to a common pressure relief vent that has some potential to release radionuclides if the tanks are overfilled or overheated. Normal emissions should be zero since the stored liquids are quiescent, the dissolved radionuclides are non-volatile, and the vents are not open except during filling.

#### Laboratory Fume Hoods

Laboratory analysis of process and other samples is performed in the PORTS on-site laboratory in accordance with standard laboratory practices. There are no emissions controls on the lab hoods used in these procedures. The hoods should not exhibit any measurable radionuclide emissions during normal operation. Most laboratory fume hoods are located in the X-710 Laboratory. The X-705 Decontamination Facility also has a small laboratory which contains three fume hoods which were used to prepare samples and analyze materials being processed in the building. This laboratory has been out of service for several years, but could be used again in the future.

The X-710 Laboratory is in routine use. Consequently, emission estimates were included in the source term for the dose modeling using CAP88-PC. The emissions from the X-710 were modeled as a single source.

#### XT-847 Glove Box

The XT-847 Glove Box is a large stainless steel glove box which is used to batch small quantities of radioactively contaminated waste for more efficient and less costly storage, shipment, and disposal. The primary waste stream involved is spent alumina and other adsorbents used in control traps on process vents. When the adsorbent is removed from use, it is placed in a safe geometry container (5", 8" or 12" diameter, depending on assay). The material is then analyzed, and if the uranium content meets nuclear criticality safety limits, it is batched into larger containers including, but not limited to, 55 gallon drums. Other radiological materials may also be handled in the glove box. The XT-847 Glove Box exhausts through a HEPA filter and is normally in routine use. However, the Glove Box was not operational in 2015.

#### X-326 L-cage Glove Box

The X-326 L-cage Glove Box has airlocks for the entry and removal of work materials and is maintained under negative pressure during use. This negative pressure is produced by an exhaust fan drawing air through a high-efficiency particulate (HEPA) filter. Effluent control is provided by the HEPA filter; calculations of emissions from the glove box assume a HEPA filter control factor of 0.01 (99 percent efficiency) as provided in Title 40 of the *Code of Federal Regulations (CFR)*, Part 61, Appendix D. Materials contaminated with radionuclides are sampled, batched, blended, or repackaged in the Glove

Box and generate low emissions of radionuclides. This Glove Box was not used during 2015.

#### X-622, X-623, X-624, and X-627 Groundwater Treatment Facilities

The X-622, X-623, X-624, and X-627 Groundwater Treatment Facilities treat groundwater contaminated with volatile organic compounds and radionuclides and release treated water through permitted National Pollutant Discharge Elimination System (NPDES) outfalls. To reduce air emissions of volatile organic compounds from the groundwater treatment facilities, a de-mister is installed on the air stripper at X-622, and off-gas carbon units are installed on the air strippers at the X-623, X-624, and X-627 facilities. The clarifier at the X-622 Groundwater Treatment Facility is part of the treatment process and is vented to the environment. No control equipment is installed at any of the groundwater treatment facilities to reduce emissions of radionuclides.

#### X-735 Landfill

The current Permit-to-Install and Operate for the venting system at the X-735 Landfill, issued by the Ohio Environmental Protection Agency, includes a requirement for compliance with NESHAP Subparts A (General Provisions) and H (National Emission Standards for Emissions of Radionuclides Other Than Radon from DOE Facilities), although the NESHAP provisions are administered directly by U.S. EPA.

The results of air emissions testing of the X-735 Landfill venting system, performed from September 25 through September 29, 1995, were used to calculate radionuclide emissions from the landfill. During the testing, samples were collected from a uniform pattern of 16 of the 33 landfill vents and analyzed for gross alpha activity and gross beta activity. Alpha activity was not detected in any of the samples. Beta activity was detected in 1 of the 16 samples at one picocurie (pCi)/sample, which was just above the analytical detection limit of 0.9 pCi/sample.

In the *Performance Test Report X-735 Landfill Closure (Northern Portion) Cap Construction and Gas Venting System* (DOE 1995), the average beta activity per cubic meter per vent was calculated using the conservative assumption that beta activity was being emitted at half the detection limit in the 15 vents in which beta activity was undetected. Emissions of beta activity for all 33 vents were calculated as 0.00213 pCi/min (DOE 1995).

For compliance with NESHAP Subpart H regulations, beta emissions were conservatively assumed to be technetium-99, the only radionuclide associated with PORTS activities that is a beta emitter (the transuranics and uranium isotopes associated with PORTS are alpha emitters). Because alpha activity was not detected in the emissions testing, it is not included in the dose assessment. The annual emission rate of 0.0000000011 (1.1E-09) curie (Ci)/year of technetium-99 results in a dose of 0.00000016 (1.6E-07) millirem (mrem)/year to an individual 250 meters north of the X-735 Landfill at the PORTS property boundary. Because the dose from the X-735 Landfill venting system is more than one million times smaller than the doses from the groundwater treatment facilities and more than one billion times smaller than the regulatory limit of 10 mrem/year, the X-735 Landfill venting system is not a major contributor to the DOE dose and will not be discussed in the remainder of this report.



## 2. RADIONUCLIDE EMISSIONS

Section 2.1 discusses the methods used to calculate radionuclide emissions from each of the DOE sources that emitted radionuclides during 2015. Table 2 presents a summary of the radionuclide emissions from DOE sources in 2015.

**Table 2. Emissions (Ci/year) from DOE Air Emission Sources in 2015**

Radionuclide	Group 1 <sup>b</sup>	Group 2 <sup>c</sup>	Group 3 <sup>d</sup>	DUF <sub>6</sub> facility
Americium-241	3.663E-07	-	6.188E-07	-
Neptunium-237	2.701E-07	-	9.455E-06	-
Plutonium-238	0.000E+00	-	6.403E-08	-
Plutonium-239/240 <sup>a</sup>	2.095E-07	-	3.621E-06	-
Technetium-99	4.889E-03	1.791E-03	2.452E-02	-
Uranium-233/234 <sup>a</sup>	1.057E-03	5.335E-04	3.563E-04	1.38E-06
Uranium-235	4.990E-05	2.884E-05	1.480E-05	6.31E-08
Uranium-238	4.697E-04	5.466E-04	9.683E-05	3.38E-06
Thorium-228	3.740E-08	0.000E+00	3.390E-10	-
Thorium-230	3.750E-05	4.057E-06	3.400E-10	-
Thorium-231	4.967E-05	2.884E-05	4.720E-06	1.99E-07
Thorium-232	2.290E-09	0.000E+00	2.070E-11	-
Thorium-234	4.676E-04	5.466E-04	4.070E-05	1.82E-05
Protactinium-234m	4.676E-04	5.466E-04	4.070E-05	1.82E-05
Total	7.489E-03	4.026E-03	2.509E-02	3.66E-05

<sup>a</sup>Plutonium-239/240 is entered as plutonium-239 and uranium-233/234 is entered as uranium-234 in the CAP88-PC model.

<sup>b</sup>Group 1 consists of Source 1 (X326 Top Purge and Emergency Jet Vents), Source 2 (X-326 Seal Exhaust Vents), Source 8 (X-710 vents), Source 10 (XT-847 Glove Box), and Source 13 (X-622 GWTF)

<sup>c</sup>Group 2 consists of Source 5 (X-344A Gulper Vent) and Source 12 (X-344A Cold Trap Vent)

<sup>d</sup>Group 3 consists of Source 3 (X-330 Vents), Source 4 (X-333 Vents), Source 6 (X-700 Vents), Source 7 (X-705 Vents), Source 14 (X-623 GWTF), Source 15 (X-624 GWTF), and Source 16 (X-627 GWTF)

Table 3, Table 5, and Table 6 list the distances from the DOE air emission sources to the nearest public receptors as required by 40 CFR Section 61.94(b)(6) and control device information as required by 40 CFR Section 61.94(b)(5).

**Table 3. Distances to Nearest Public Receptors from DOE Sources**

Source	Control Device	Control Efficiency	Distance in meters to the nearest public receptors					
			Resident	School	Office/ Business	Farm		
						Crops/Vegetables	Meat	Milk
DUF <sub>6</sub> facility	HEPA Filters	99.9%	1329 W	4320 N	988 WNW	2033 W	1609 W	3900 NNE
X-326 <sup>a</sup>	HEPA Filters	99.9%	1383 E	4999 NNW	1677 WNW	2185 WSW	1671 WSW	4498 N
X-622	None	N/A	1040 SE	5392 NNW	1293 SSE	2184 WSW	1495 SSE	4804 N
X-623	None	N/A	838 ESE	4264 NNW	2286 W	2800 SSE	1037 E	3505 NNW
X-624	None	N/A	579 ESE	4294 NNW	2652 W	2776 SSE	525 ESE	3353 NNW
X-627	None	N/A	1377 ESE	4118 NNW	5421 W	2654 W	1495 E	3439 N

<sup>a</sup>This includes only the X-326 Glove Box

## 2.1 POINT SOURCES

### 2.1.1 PROCESS VENTS

Table 4 shows the grouping of vents for modeling (discussed below). Table 2 presents a summary of source term emissions for 2015. Table 5 and Table 6 summarize the control device information for each source and give the distance and direction from each source to the nearest resident, school, office or business, and vegetable, meat, and milk-producing farms.

The CAP88-PC model allows up to six sources to be modeled at one time, but assumes that all sources are located at the origin of the same circular grid. Since 2001, the gaseous diffusion plant sources have been grouped into three different source groups for the purposes of modeling. Beginning in 2013, with the concurrence of U.S. EPA, the X-622, X-623, X-624, and X-627 Groundwater Treatment Facility vents will now be included in the existing source groups. This will reduce the number of modeling runs without having an impact on determining the public dose. Emissions for all sources in a group were modeled from the representative stack, the stack which contributes the majority of the emissions within that group. These source groups are as follows:

Group 1 includes the X-326 Stack, all other X-326 vents, all X-710 Laboratory vents the XT-847 Glove Box Exhaust, and the X-622 Groundwater Treatment Facility; these sources were modeled from the location of the X-326 Stack. The XT-847 Glove Box Exhaust had no radioactive emissions for 2014. Group 2 includes only the two X-344A vents; modeled from the location of X-344A Cold Trap Vent. Group 3 includes the X-330, X-333, X-343, X-700, X-705, X-720 building vents, and the X-623, X-624, and X-627 Groundwater Treatment Facility vents; modeled from the location of the X-627 GWTF vent. Five of the nine buildings in Group 3; X-330, X-333, X-343, X-700 and X-720; had no active radioactive emission sources during 2015.

**Table 4. Grouping of Vents for Modeling**

Source	Consists of	Modeled with Source
1	X-326 Top Purge Vent, Side Purge Vent and Emergency Jet Vent	1
2	X-326 SE 6 Vent, SE 5 Vent, SE 4 Vent and ventilation exhaust	1
3	X-330 Building Cell Evacuation/Cold Recovery Vent, SE 3 Vent, SE 2 Vent and ventilation exhaust (inactive)	16
4	X-333 Cold Recovery Vent, Building Wet Air Evacuation Vent, SE 1 Vent and ventilation exhaust (inactive)	16
5	X-344A Gulper Vent	5
6	All X-700 vents (inactive)	16
7	All X-705 vents	16
8	All X-710 vents	1
9	All X-720 vents (inactive)	16
10	XT-847 Glove Box Vent (inactive)	1
11	X-343 Cold Trap Vent (inactive)	16
12	X-344A Cold Trap Vent	5
13	X-622 Groundwater Treatment Facility	1
14	X-623 Groundwater Treatment Facility	16
15	X-624 Groundwater Treatment Facility	16
16	X-627 Groundwater Treatment Facility	16

Table 5. Process Building Vent Sources

Point Source <sup>a</sup>	Control Device	Control Efficiency	Distance in Meters to the Nearest:				
			Resident	School	Office or Business	Farm	
						Milk	Meat
							Veg.
X-326 Top Purge, Side Purge & E-jet (Cascades) (3 monitors) <sup>b</sup>	Chemical Adsorbents	0-95% <sup>c</sup>	1370 SE	5000 NNW	1520 SSE	4290 N	1370 E
X-330 Cold Recovery/Wet Air Evacuation Vent	Cold Traps Chemical Adsorbents	90-95% <sup>d</sup> 0-95% <sup>c</sup>	1690 ESE	3930 NNW	1370 W	3200 N	1520 ESE, W
X-333 Cold Recovery Vent	Cold Traps Chemical Adsorbents	90-95% <sup>d</sup> 0-95% <sup>c</sup>	1330 ESE	3840 NNW	1860 WSW	2960 N	1230 SE
X-333 Wet Air Evacuation Vent	Chemical Adsorbents	0-95% <sup>c</sup>	1330 ESE	3840 NNW	1860 WSW	2960 N	1230 SE
X-326 Seal Exhaust Area 6	Chemical Adsorbents	0-95% <sup>c</sup>	1430 E	4880 NNW	1620 SSE	4180 N	1340 E
X-326 Seal Exhaust Area 5	Chemical Adsorbents	0-95% <sup>c</sup>	1460 E	4630 NNW	1540 WNW	3940 N	1340 E
X-326 Seal Exhaust Area 4	Chemical Adsorbents	0-95% <sup>c</sup>	1500 ESE	4420 NNW	1460 WNW	3720 N	1340 E

See notes on page 15.

Table 5. Process Building Vent Sources, continued

Point Source <sup>a</sup>	Control Device	Control Efficiency	Distance in Meters to the Nearest:				
			Resident	School	Office or Business	Farm	
						Milk	Veg.
X-330 Seal Exhaust Area 3	Chemical Adsorbents	0-95% <sup>c</sup>	1620 E	4080 NNW	1400 W	3360 N	8400 ENE
X-330 Seal Exhaust Area 2	Chemical Adsorbents	0-95% <sup>c</sup>	1725 ESE	3690 NNW	1430 WSW	3020 N	8320 ENE
X-333 Seal Exhaust Area 1	Chemical Adsorbents	0-95% <sup>c</sup>	1330 ESE	3840 NNW	1860 WSW	2960 N	7890 ENE
X-343 Cold Trap Vent	Cold Traps Chemical Adsorbents	90-95% <sup>d</sup> 0-95% <sup>c</sup>	1070 ESE	3980 NW	2130 WSW	2980 N	7620 ENE
X-344A Gulper Vent	HEPA Filters	99.97%	1830 ESE	3410 NNW	1460 WSW	2680 N	8320 ENE
X-344A Cold Trap Vent	Cold Traps Chemical Adsorbents	90-95% <sup>d</sup> 0-95% <sup>c</sup>	1870 ESE	3380 NNW	1440 WSW	2660 N	8340 ENE
XT-847 Glove Box	HEPA Filters	99.97%	640 SSW	5840 N	980 SE	5150 N	9150 ENE

See notes on page 15.

Table 6 Grouped Sources

Point Source <sup>a</sup>	Control Device	Control Efficiency	Distance in Meters to the Nearest:				
			Resident	School	Office or Business	Farm	
						Milk	Veg.
X-705 Calciners (3)	Wet Scrubber	99%	1330 ESE	4020 NNW	1800 W	3200 N	7960 ENE
X-710 Laboratory Fume Hoods (39)	None	N/A	1260 E	4690 NNW	1660 W	3930 N	8350 ENE
X-705 Decontamination Facility	One area HEPA Others none	99.97% N/A	1330 ESE	4020 NNW	1800 W	3200 N	7960 ENE
X-705 Storage Tank Vents	None	N/A	1330 ESE	4020 NNW	1800 W	3200 N	7960 ENE
X-700 Cleaning Building	HEPA Filters	99.97%	1220 ESE	3910 NNW	1910 W	3200 N	7840 ENE
X-720 Maintenance Facility	None	N/A	1220 E	4250 NNW	1800 W	3430 N	7880 ENE
Room Air Exhausts	None	N/A	850 ESE	3410 NNW	1370 W	2680 N	7560 ENE

See notes on page 14.

Notes to Tables in Section 2.0

<p>a. All sources in Table 2.0 have continuous vent monitors except the XT-847 Glove Box.</p>	<p>b. The Top and Side Purge Cascade vent streams pass separately through activated alumina traps. A third line, the Emergency Jet, connects to both lines through block valves. All three lines have continuous samplers. The three vent lines connect to four exhaust pipes that extend above the 50-meter tower. The Top Purge jet is vented directly through one pipe. The Side Purge Jet and Emergency Jet lines are interconnected to the other three pipes.</p>	<p>c. Chemical adsorbents (such as activated alumina and sodium fluoride) are approximately 95 percent effective at concentrations above 1 ppm. Below this concentration, chemical adsorbents have reduced efficiency or no effect. Normal concentrations entering the Purge Cascade Chemical Traps are near or below 1 ppm. The sample traps (which follow the control traps) use activated alumina hydrated to 14 percent moisture content, which is much more effective due to an instantaneous reaction of gaseous UF<sub>6</sub> and 99Tc with the water to form particulate matter.</p>	<p>d. Based on process knowledge, cold traps are estimated to be approximately 90 to 95 percent effective in trapping gaseous UF<sub>6</sub>.</p>
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### 2.1.2 OTHER POINT SOURCES

Emissions from the X-622, X-623, X-624, and X-627 Groundwater Treatment Facilities were calculated based on quarterly influent and effluent sampling at each facility, and quarterly throughput. The activity measured in the effluent sample was subtracted from the influent sample; the difference is assumed to have been emitted from the facility. As a conservative measure, radionuclides that were not detected in the samples were assumed to be present at half the undetected result.

Emissions from the X-326 L-cage Glove box were based on the mass of the materials transferred within the glove box, analytical data available on each material for radionuclides identified for air monitoring at PORTS (americium-241, neptunium-237, plutonium-238, plutonium-239/240, technetium-99, uranium-233/234, uranium-235, uranium-236, and uranium-238), and emission factors provided in 40 CFR Part 61 Appendix D.

Emissions from the DUF<sub>6</sub> conversion facility were provided by BWCS. Emissions were based on data collected from the conversion stack continuous sampling system.

Emissions from the X-326, X-330, and X-344A process vents were calculated based on weekly sample trap results for technetium-99, uranium-233/234, uranium-235, uranium-238, thorium-228, thorium-230, and thorium-232. Emissions from the X-705 vents, X-710 vents, and X-720 vents were based on mass of materials processed and emission factors provided in 40 CFR Part 61 Appendix D.

Table 2 identifies the emissions from these sources for 2015.

### 2.2 FUGITIVE AND DIFFUSE SOURCES

Fugitive and diffuse emissions include all emissions that do not pass through a discrete stack, vent, or pipe. Potential emissions of diffuse and fugitive emissions at PORTS include normal building ventilation, soil and groundwater remediation sites, and wastewater treatment facilities.

Ambient air monitoring stations are used at PORTS to confirm that radiological emissions from the site produce a dose much less than the level allowed by regulations. The ambient air monitors are divided into three groups: on site, property line, and off site. One monitor is located 13 miles southwest of the facility to measure background levels of radionuclides. Quality Assurance for the ambient air monitors is maintained through the *Sampling, Analysis and Quality Assurance Plan for the Portsmouth Gaseous Diffusion Plant Ambient Air Monitoring Program* (LPP-0086.)

Samples are collected weekly from the monitoring stations. Samples are then composited into a monthly sample and analyzed for radionuclides representative of PORTS operations. Analyses for transuranic radionuclides (americium-241, neptunium-237, plutonium-238, and plutonium-239/240) are performed quarterly based on the infrequent detections of these radionuclides. Analyses of technetium-99, uranium-233/234, uranium-235/236, and uranium-238 are performed monthly. Section 4.3, Table 10, provides a dose estimate for each ambient air monitoring station based on the results of this ambient air sampling.



### 3. DOSE ASSESSMENT

#### 3.1 DESCRIPTION OF DOSE MODEL

CAP88-PC Version 4.0, a computer program approved by U.S. EPA for compliance with 40 CFR Part 61 Subpart H, was used to calculate the dose from DOE radionuclide emissions to air. The program uses a modified Gaussian plume equation to estimate the dispersion of radionuclides. The program computes radionuclide concentrations in air, rates of deposition on ground surfaces, concentrations in food, and intake rates to people from ingestion of food produced in the assessment area.

#### 3.2 SUMMARY OF INPUT PARAMETERS

Input parameters for the CAP88-PC model include physical parameters for each radionuclide emission source, radionuclide emissions, meteorological data, and agricultural data. Table 2 (Section 2.) provides the radionuclide emissions for each source. Default values were used for the size and class of each radionuclide. Table 7 provides the physical parameters for each source.

**Table 7. Physical Parameters for DOE Air Emission Sources**

Parameter	Group 1	Group 2	Group 3	DUF <sub>6</sub> facility
Stack height (m)	50	20	6	21.95
Stack diameter (m)	0.25	0.36	0.2	1.07
Exit velocity (m/sec)	18	0.3	11	17.4

Site-specific meteorological data were used in the CAP88-PC model. Data from the National Weather Service were used when necessary to substitute data. An upgrade to the on-site meteorological was completed in May 2016. The upgrade replaced equipment that had become antiquated and less reliable. The following data were collected for calendar year 2015:

Annual precipitation:	123.7 cm/year
Average air temperature:	12.7 °C
Average mixing layer height:	772.3 meters

Precipitation was measured by an automated gauge near the on-site meteorological tower, which is backed-up by an automated gauge at the X-230L North Holding Pond. The location of the on-site meteorological tower is shown on Figure 4. Air temperature was measured at the on-site meteorological tower. The wind files used in the CAP88-PC model were generated from data collected at the 10-meter, 30-meter and 60-meter heights from the on-site meteorological tower. Wind roses showing the prevailing wind directions for calendar year 2015 are shown below in Figure 1 (10-meter height), Figure 2 (30-meter height) and Figure 3 (60-meter height). The wind roses show that the wind blew primarily from the South and Southwest directions in calendar year 2015.

It should be noted that the default values provided with the CAP88-PC model can be very conservative. The rural food array used to estimate the DOE PORTS dose assumes that the public obtains all foodstuffs within 50 miles of the plant (see Table 8). In reality, the majority of the foodstuffs consumed locally are purchased at supermarkets that receive foodstuffs from all over the world.

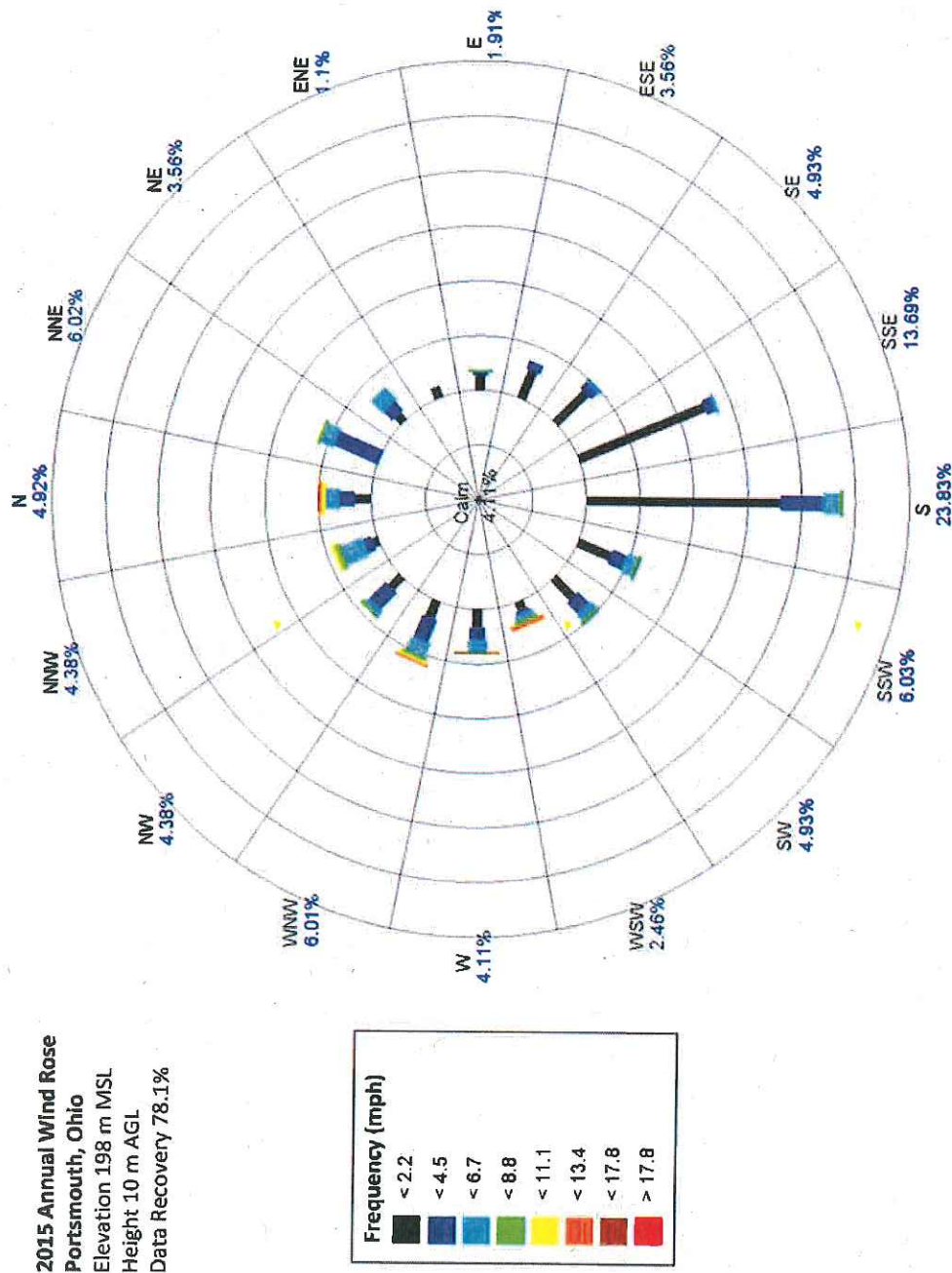
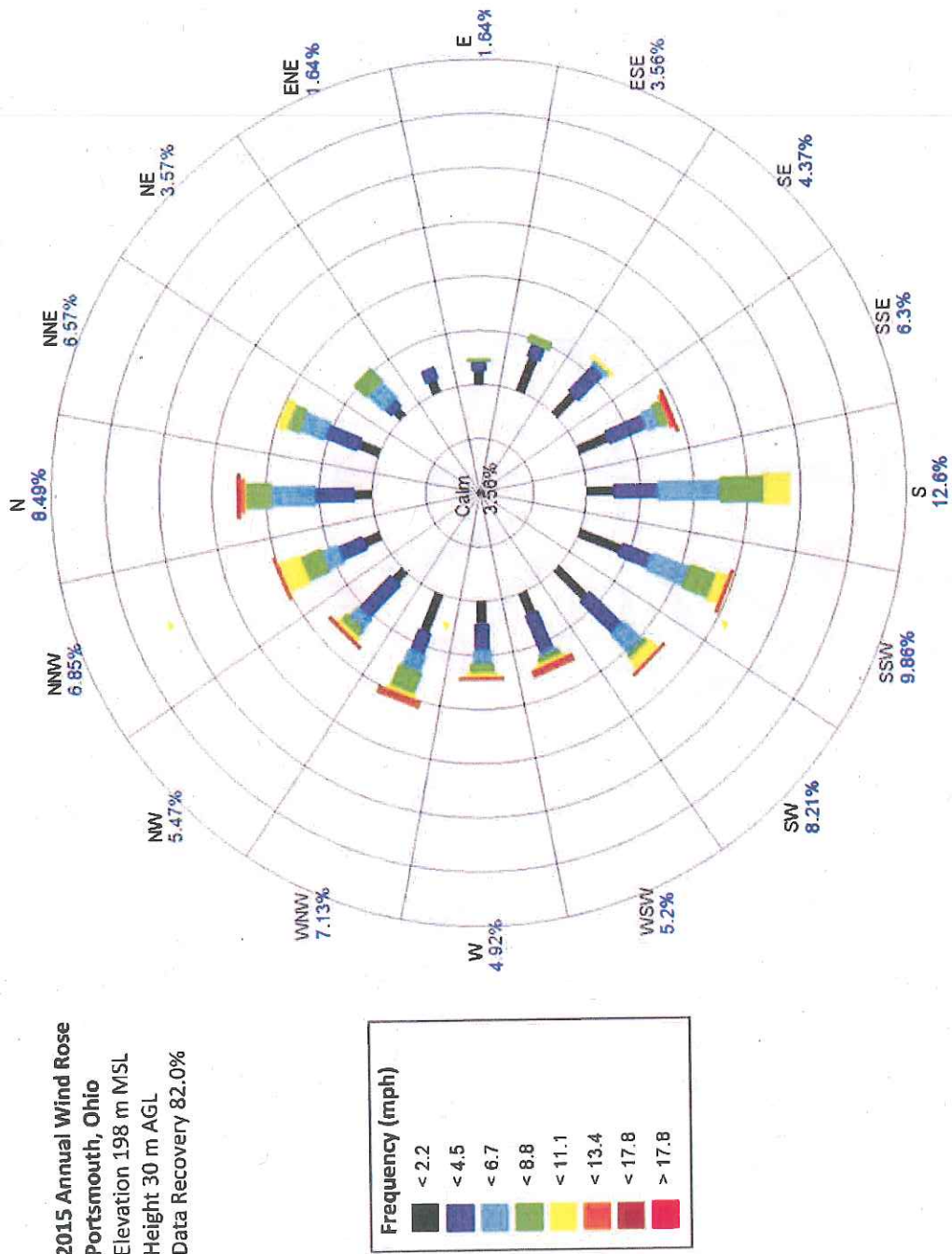
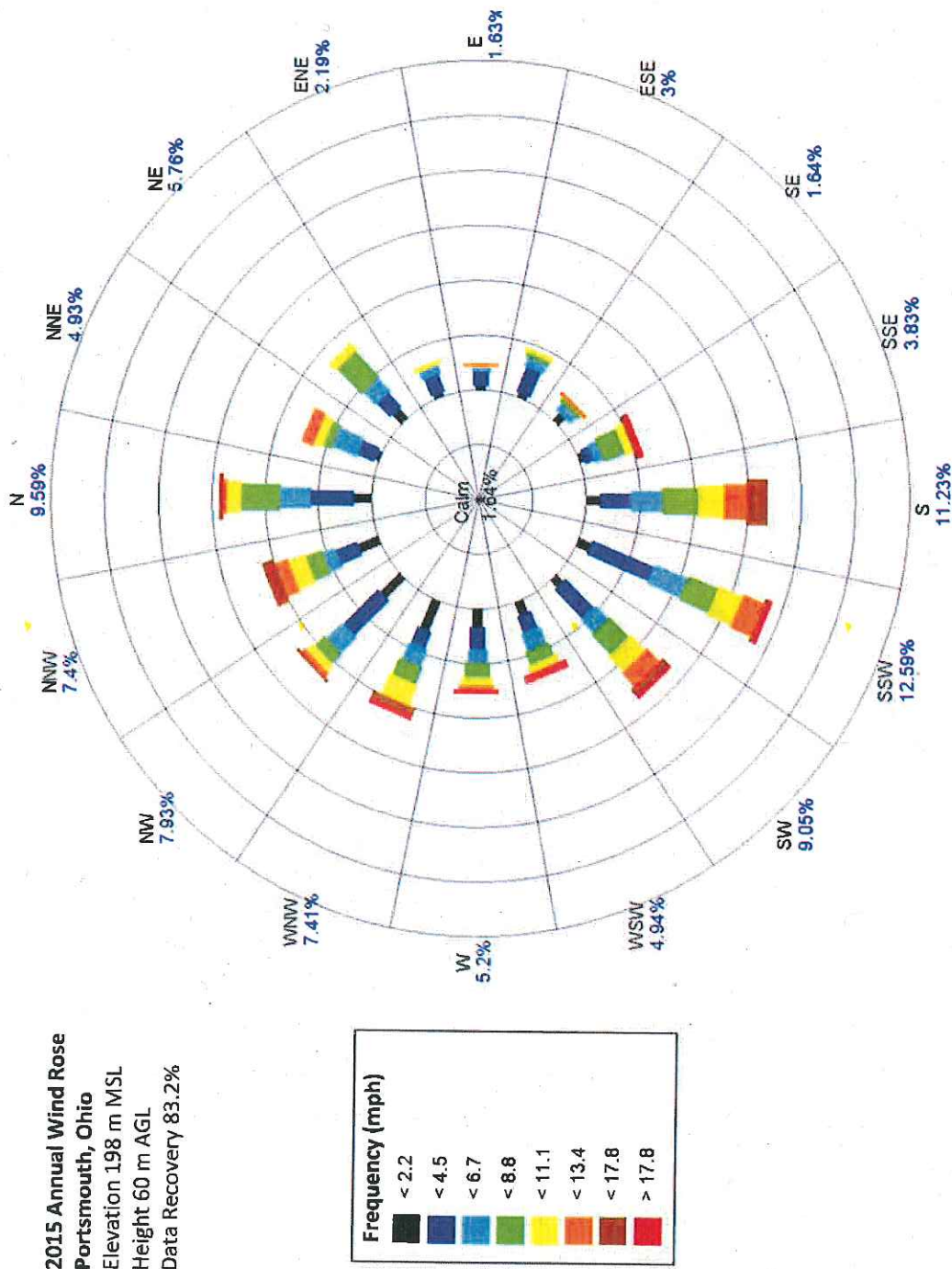


Figure 1 CY 2015 PORTS Wind Rose for 10-meter Height



Period: 1/1/2015-12/31/2015

Figure 2 CY 2015 PORTS Wind Rose for 30-meter Height



Period: 1/1/2015-12/31/2015

**Figure 3 CY 2015 PORTS Wind Rose for 60-meter Height**

**Table 8. Agricultural Data: Rural Default Food Array Values**

Fraction of Foodstuffs	Local Area	Within 50 Miles	Beyond 50 Miles
Vegetables and produce	0.700	0.300	0.000
Meat	0.442	0.558	0.000
Milk	0.399	0.601	0.000

### 3.3 RESULTS

The CAP88-PC model estimated the 2015 maximum effective dose for the maximally exposed individual (MEI) near PORTS based on emissions from DOE sources to be 0.037 mrem/year. This effective dose includes dose contributions from all of the radionuclides listed in Table 2.

The effective dose to individuals based on Centrus emissions has been combined with the DOE effective dose. In 2015, the maximum effective dose for Centrus was 0.0000067 mrem/year, as provided to DOE by Centrus. DOE is not certifying the accuracy of the Centrus data. DOE understands that the Centrus PORTS NESHAP report will be provided to U.S. EPA by Centrus and will be certified by Centrus.

The DOE effective dose is combined with the Centrus effective dose to determine a total effective dose from the PORTS facility. The highest combined effective dose value is the maximum effective dose to the MEI (see Table 9). In 2015, the maximum effective dose to the MEI is 0.037 mrem/year (0.037 mrem/year from DOE sources 0.0000028 mrem/year from Centrus sources), which is well below the NESHAP standard of 10 mrem/year.

**Table 9. Summary of the CAP88-PC Model Effective Dose (mrem/year) to the DOE, CENTRUS, and Combined MEIs in 2015**

	Location [distance (meters), Direction, and DOE Source]	Dose from DOE Sources	Dose from CENTRUS	Combined Dose
DOE MEI location and maximum combined MEI location (DOE + Centrus)	4200 N of Group 1 vents 2540 N of Group 2 vents 3170 N of Group 3 vents 3650 NNE of DUF <sub>6</sub> facility	0.037	0.0000028	0.037
Centrus MEI location	1490 SSW of Group 1 vents 3010 S of Group 2 vents 2530 SSW of Group 3 vents 2200 S of DUF <sub>6</sub> facility	0.016	0.0000067	0.016



## 4. ADDITIONAL INFORMATION

### 4.1 NEW/MODIFIED SOURCES

There were no new/modified sources during 2015.

### 4.2 UNPLANNED RELEASES

There were no unplanned releases of radionuclides during 2015.

### 4.3 DOSE CALCULATIONS FOR EVALUATION OF DIFFUSE/FUGITIVE EMISSIONS

Ambient air monitoring stations (see Figure 4) measure radionuclides released from the DOE and Centrus point sources (see Table 2 and Table 5), fugitive air emission sources such as those discussed in Section 2.3, and background levels of radionuclides. Samples are collected weekly from 15 stations and composited monthly. Analyses for transuranic radionuclides (americium-241, neptunium-237, plutonium-238, and plutonium-239/240) are performed quarterly based on the infrequent detections of these radionuclides. Analyses of technetium-99, uranium-233/234, uranium-235/236, and uranium-238 are performed monthly.

The CAP88-PC model is used to generate a dose conversion factor for each radionuclide. The dose conversion factor is used to compute a dose in mrem/year for a given activity of a radionuclide in air (in picocuries per cubic meter). For radionuclides that were detected in ambient air during 2015, the dose for that radionuclide is calculated by using the maximum activity of each detected radionuclide. For radionuclides that were never detected, the dose is calculated by using half of the highest undetected result to calculate the maximum activity of the radionuclide in air. The doses attributable to each radionuclide are then added to obtain the gross dose for each station. The net dose is obtained by subtracting the dose at station A37, the background monitoring station (the net dose is recorded as zero for stations with a gross dose less than the background station).

Table 10 summarizes the total dose (both gross and net) for each station. The highest net dose for the ambient air monitoring stations was 0.0012 mrem/year at stations A28 and A41A, which are southwest and northeast of PORTS property.

**Table 10. Summary of Doses (mrem/year) at Ambient Air Monitoring Stations in 2015**

Station	Gross dose	Net dose	Station	Gross dose	Net dose
A3	4.7E-03	0	A24	5.5E-03	8.0E-04
A6	5.5E-03	8.0E-04	A28	5.9E-03	1.2E-03
A8	5.1E-03	4.0E-04	A29	5.3E-03	6.0E-04
A9	5.7E-03	1.0E-03	A36	2.6E-03	0
A10	4.9E-03	2.0E-04	A37 (bkg)	4.7E-03	-
A12	3.6E-03	0	A41A	5.9E-03	1.2E-03
A15	4.8E-03	1.0E-04	T7	3.9E-03	0
A23	5.4E-03	7.0E-04			

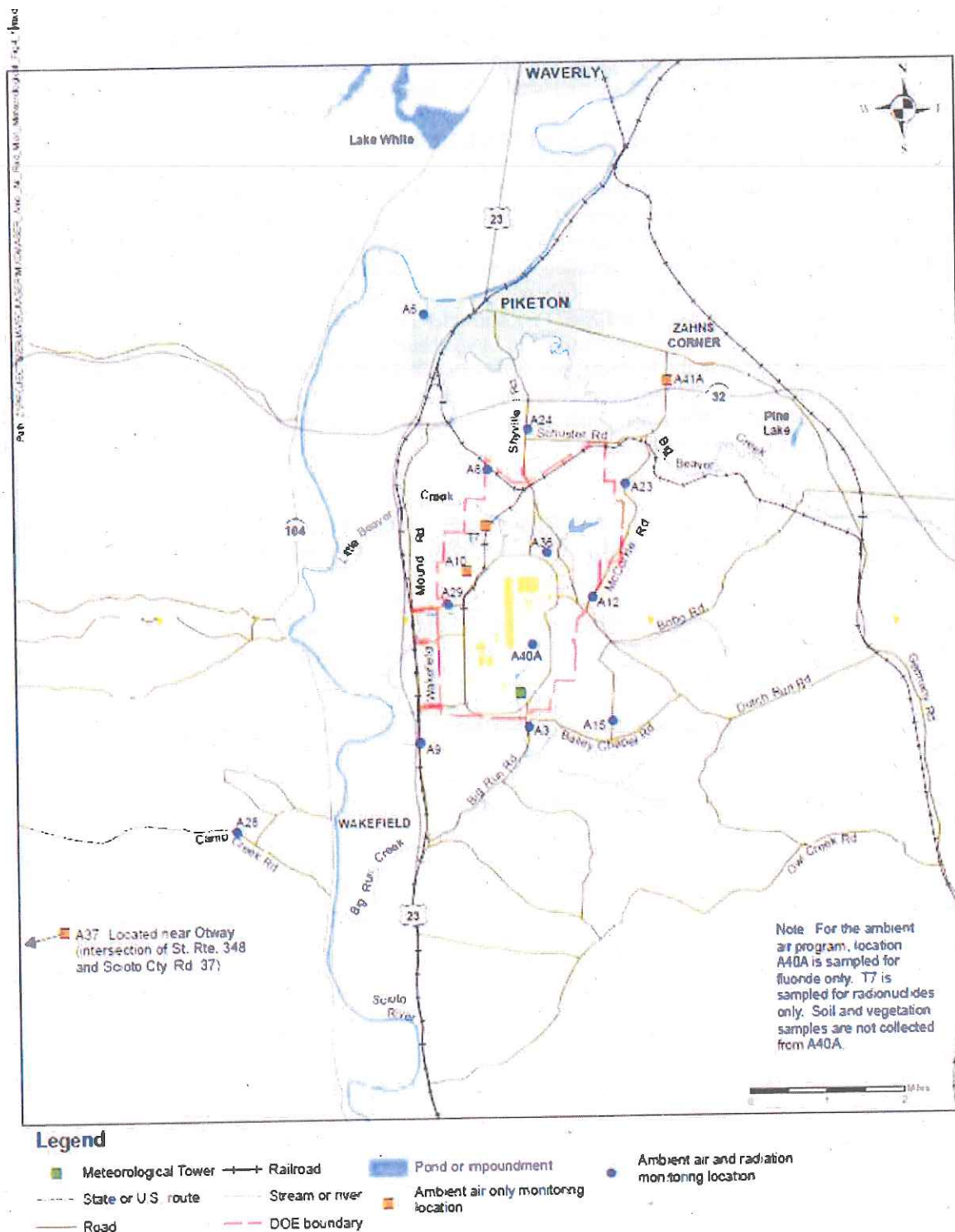


Figure 4. DOE PORTS Ambient Air Monitoring and Onsite Meteorological Monitoring Stations

The highest net dose measured at the ambient air monitoring stations (0.0012 mrem/year) is three percent of the dose calculated from the combined DOE and Centrus point source emissions (0.037 mrem/year). These results indicate that fugitive and point source emissions of radionuclides from the PORTS reservation do not cause a significant dose to individuals near the site and further demonstrate that emissions of radionuclides from PORTS are well within NESHAP limits.

#### 4.4 DOSE CALCULATIONS FOR SECURITY FENCE LINE LOCATIONS

Per request by U.S. EPA Region 5, a dose calculation using the CAP88-PC model was also completed for locations around the perimeter of the security fence of the PORTS process area (the limited access area). Emissions from the DOE radionuclide sources (the X-326 Top and Side Purge Cascades, X-326 and X-330 Seal Exhaust Stations, X-330 Cold Recovery System, X-330 Building Wet Air Evacuation System, X-344A Cold Trap Area and Manifold Evacuation/Gulper, X-705 Decontamination Facility, Calciners, Glove Boxes, and Storage Tank Vents, X-710 Laboratory Fume Hoods, XT-847 Glove Box, X-326 L-cage Glove box, X-622, X-623, X-624, and X-627 Groundwater Treatment Facilities, and DUF<sub>6</sub> conversion facility) were used to determine the dose to a hypothetical person living at the fence line for the limited access area at each of the 16 directional sectors around the plant (i.e., north, north-northeast, northeast, east-northeast, etc.). The maximum dose a hypothetical person living at the PORTS security fence line would receive from DOE radionuclide emissions is 0.018 mrem/year at the north sector of the security fence line for the limited access area.

#### 4.5 REFERENCES

DOE 1995. *Performance Test Report X-735 Landfill Closure (Northern Portion) Cap Construction and Gas Venting System*, DOE/OR/11-1420&D1, POEF-ER-4626&D1. Lockheed Martin Energy Systems, Piketon, Ohio.

*Phase I Sampling and Analysis Plan for the Process Equipment Characterization in Support of Site-wide Waste Disposition Evaluation Project at the Portsmouth Gaseous Diffusion Plant Piketon Ohio (DOE/PPPO/03-0120&D2)*

*Sampling, Analysis and Quality Assurance Plan for the Portsmouth Gaseous Diffusion Plant Ambient Air Monitoring Program*, LPP-0086.

*Methods for Estimating Fugitive Emissions of Radionuclides from Diffuse Sources at DOE Facilities (EPA2004)*



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